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not numerous, and even these are so involved by the differences in the statutes under which they were made and the facts under which the question arose that no rule can be given. Most of the decisions are reviewed in the above case. Some of them have arisen on removal to the federal courts, some on state statutes, some on removal by plaintiff, some by garnishee, some by claimant; some on removal of main action, and some on removal after judgment in that part of the proceeding. See *ROOD ON GARNISHMENT*, §§ 325-328.

HUSBAND AND WIFE—HOMESTEAD—PARTITION.—Defendant, in order to compromise a suit for divorce, deeded to his wife an undivided half of the homestead. Later she left because of his cruel treatment and brought an action for partition of the homestead. *Held*, that partition could not be decreed. *Grace v. Grace* (1905), — Minn. —, 104 N. W. Rep. 969.

The court held that even though all the homestead rights were in the husband's undivided half, the wife could not make a valid sale or conveyance destroying the homestead, under the statute which provided that the wife could not convey the homestead or any interest therein unless her husband joins with her in the conveyance. To allow the wife by leaving her husband to acquire the right to compel partition of the homestead in which she had an undivided half interest would be to allow her to do indirectly by partition what she could not do directly by sale or conveyance. *Mitchell v. Mitchell*, 101 Ala. 183, 13 So. Rep. 147; *Brooks v. Hotchkiss*, 4 Ill. App. 175; *Ehrck v. Ehrck*, 106 Iowa 614, 76 N. W. Rep. 793, 68 Am. St. Rep. 330. By the weight of authority a conveyance of the property in which a homestead exists may be made by the husband alone to the wife, either directly or indirectly, though the statute provides that the homestead cannot be conveyed without the signature of both. *Kindley v. Spraker*, 72 Ark. 228, 105 Am. St. Rep. 32; *Furrow v. Athey*, 21 Neb. 671; *Lynch v. Doran*, 95 Mich. 395, 54 N. W. Rep. 882. The husband may have a homestead right in land owned in common by the husband and wife. *Lozo v. Sutherland*, 38 Mich. 168. The principal case seems in line with the reason of the homestead exemption since it is a law for the benefit of the family and the husband does not cease to be the head of a family, in the eye of the law, by reason of the desertion of the wife. *Gates v. Steele*, 48 Ark. 539; *Brown v. Brown*, 68 Mo. 388; *Pardo v. Bittorf*, 48 Mich. 275. The wife, however, is not left without a remedy. By an absolute divorce the homestead would be terminated. *Kern v. Field*, 68 Minn. 317, 71 N. W. Rep. 393, 64 Am. St. Rep. 479. "That the legislature has not provided relief for her under such circumstances as would justify her in leaving her husband, though not necessarily entitling her to a divorce does not alter the letter and spirit of the homestead law." *Grace v. Grace*, *supra*.

INJUNCTION—TRADE SECRETS.—Where an employee has been acquainted with valuable trade secrets under an express agreement not to reveal the same, it is *held* that he may be enjoined from divulging them, and a would-be employer may be restrained from making use of such secrets and from employ-